**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NOVARTIS PHARMACEUTICALS CORPORATION, NOVARTIS CORPORATION, AND NOVARTIS AG	))))	
Plaintiffs,	))	Civil Action No. 12-03967 (SDW) (MCA)
v.	)))	**NOVARTIS'S NOTICE OF MOTION TO SEAL**
WOCKHARDT USA LLC; and WOCKHARDT LTD.	)))	**Motion Day: June 17, 2013**
Defendants.	))	
NOVARTIS PHARMACEUTICALS CORPORATION, NOVARTIS CORPORATION, AND NOVARTIS AG	)))))	
Plaintiffs,	))	Civil Action No. 12-04393 (SDW) (MCA) (Consolidated with Civil Action No. 12-03967)
v.	))	
SUN PHARMA GLOBAL FZE AND SUN PHARMACEUTICAL INDUSTRIES LIMITED	))))	
Defendants.	)))	

NOVARTIS PHARMACEUTICALS CORPORATION, Plaintiff, v. ACTAVIS LLC; APOTEX, INC.; APOTEX, CORP.; GLAND PHARMA LTD.; DR. REDDY'S LABORATORIES, INC.; DR. REDDY'S LABORATORIES LTD.; EMCURE PHARMACEUTICALS USA, INC.; EMCURE PHARMACEUTICALS, LTD; HOSPIRA, INC.; PHARMACEUTICS INTERNATIONAL INC.; SAGENT PHARMACEUTICALS, INC.; ACS DOBFAR INFO S.A.; STRIDES, INC.; AGILA SPECIALTIES PRIVATE LTD.; SUN PHARMA GLOBAL FZE; CARACO PHARMACEUTICAL LABORATORIES, LTD; SUN PHARMACEUTICAL INDUSTRIES LTD.; WOCKHARDT USA LLC; and WOCKHARDT LTD. Defendants.	Civil Action No. 13-1028 (SDW) (MCA)
NOVARTIS PHARMACEUTICALS CORPORATION, Plaintiff, v. ACCORD HEALTHCARE INC.; FRESENIUS KABI USA, LLC; and HIKMA FARMACEUTICA S.A., Defendants.	Civil Action No. 13-2379 (SDW) (MCA)

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PLEASE TAKE NOTICE that on June 17, 2013, or as soon as counsel can be heard, the undersigned counsel for Plaintiffs Novartis Pharmaceutical Corporation, Novartis Corporation, and Novartis AG ("Novartis") shall move pursuant to Local Civil Rule 5.3(c) before the Honorable Madeline Cox Arleo, U.S.M.J., at the United States District Court for the District of New Jersey, for an Order sealing the following documents [12-3967, D.I. 62, 71; 13-1028, D.I. 189, 233; 13-2379, D.I. 6, 13]:

1)   Portions of Novartis's Brief in Support of Its Motion to Consolidate;

2)   Exhibits 5-10, 14-21, and 24 attached to the Declaration of Robert W. Trenchard in Support of Novartis's Motion to Consolidate;

3)   Portions of Novartis's Reply Brief in Further Support of Its Motion to Consolidate; and

4)   Exhibit 1 attached to the Declaration of Robert W. Trenchard in Support of Novartis's Reply Brief in Further Support of Its Motion to Consolidate.

PLEASE TAKE FURTHER NOTICE that Plaintiff submits a publicly redacted version of Novartis's Brief and Reply Brief in Support of Its Motion to Consolidate.

PLEASE TAKE FURTHER NOTICE that Plaintiff submits the enclosed Memorandum in Support of this Motion to Seal, pursuant to Local Civil Rules 5.3(c)(1) and 7.1, and the Certification of Rachel L. Weiner attesting to the good cause for an Order sealing the above-referenced documents.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion to Seal, Memorandum and Certification of Rachel L. Weiner, and any additional submissions made hereafter, a proposed Order is also submitted.

DATED: May 14, 2013

s/ William J. O'Shaughnessy
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of the foregoing Notice of Motion to

Seal and supporting documents were caused to be served on May 14, 2013 via email and/or the

ECF system upon all counsel of record.

By: *s/ William J. O'Shaughnessy*
William J. O'Shaughnessy